

**Commonwealth of Kentucky  
Division for Air Quality**

**PERMIT APPLICATION SUMMARY FORM**

Completed by: Sajjad Quabili

GENERAL INFORMATION:

Name:	Lingo Manufacturing Co., Inc.
Address:	7400 Industrial Road Florence, KY 41042
Date application received:	11/5/2007
SIC Code/SIC description:	2542, Office and Store Fixtures, Partitions, Shelving, and Lockers, Except Wood (lunchroom tables and chairs)
Source ID:	21-015-00011
Agency Interest:	209
Activity:	APE20070001
Permit:	F-08-001

APPLICATION TYPE/PERMIT ACTIVITY:

<input type="checkbox"/> Initial issuance	<input type="checkbox"/> General permit
<input type="checkbox"/> Permit modification	<input checked="" type="checkbox"/> Conditional major
__Administrative	<input type="checkbox"/> Title V
__Minor	<input type="checkbox"/> Synthetic minor
__Significant	<input checked="" type="checkbox"/> Operating
<input checked="" type="checkbox"/> Permit renewal	<input type="checkbox"/> Construction/operating

COMPLIANCE SUMMARY:

<input type="checkbox"/> Source is out of compliance	<input type="checkbox"/> Compliance schedule included
<input type="checkbox"/> Compliance certification signed	

APPLICABLE REQUIREMENTS LIST:

<input type="checkbox"/> NSR	<input checked="" type="checkbox"/> NSPS	<input type="checkbox"/> SIP
<input type="checkbox"/> PSD	<input type="checkbox"/> NESHAPS	<input type="checkbox"/> Other
<input type="checkbox"/> Netted out of PSD/NSR	<input type="checkbox"/> Not major modification per 401 KAR 51:001, 1(116)(b)	

MISCELLANEOUS:

- ☐ Acid rain source
- ☐ Source subject to 112(r)
- ☒ Source applied for federally enforceable emissions cap
- ☐ Source provided terms for alternative operating scenarios
- ☐ Source subject to a MACT standard
- ☐ Source requested case-by-case 112(g) or (j) determination
- ☐ Application proposes new control technology
- ☐ Certified by responsible official
- ☐ Diagrams or drawings included
- ☐ Confidential business information (CBI) submitted in application
- ☐ Pollution Prevention Measures
- ☐ Area is non-attainment (list pollutants):

EMISSIONS SUMMARY:

Pollutant	Actual (tpy)*	Allowable (tpy)	Potential (tpy)
PM/PM <sub>10</sub>	0.19		25.61
SO <sub>2</sub>	0.001		0.04
NO <sub>x</sub>	0.30		10.27
CO	0.25		2.57
VOCs	6.09	<20	681.14
Ethylbenzene	0.11	<9	34.18
Methyl isobutyl ketone	0.34	<9	82.74
Xylene	0.78	<9	149.01
Cumene	0.17		4.65
Total HAPs	1.4	<20	270.58

\* 2006 inventory report

**SOURCE DESCRIPTION:**

Lingo Manufacturing Company, located in Boone County manufactures custom specialty metal shelving for display products. The process consists of two automatic spray booths, one manual spray booth, one baking oven and welding machines. Boone County is classified as a non-attainment area for Ozone.

**COMMENTS:**

A permit application from Lingo Manufacturing Company was received by the Permit Review Branch on November 5, 2007. Lingo has applied to the Division to renew their Conditional Major permit (F-03-005).

***VOC emissions:***

Lingo is potentially a major source for VOC emissions. No control equipment is utilized for VOC emissions. The current Conditional Major permit (F-03-005) was issued on February 6, 2003 with a source wide emission limitation for VOCs of ninety (95) tons per year to preclude the applicability of 401 KAR 52:020, Title V Permits. Furthermore, the facility has opted to limit their source wide VOC emissions to twenty (20) tons per year to preclude the applicability of 401KAR 59:225, New miscellaneous metal parts and products surface coating operations per Section 6(c)(3) of this regulation. Lingo's actual VOC emission for the year 2006 was 6.1 tons. A surge of VOC emission is not expected in the near future.

***HAP emissions:***

Lingo is potentially a major source for HAP emissions. No control equipment is utilized for HAP emissions. The source has voluntarily accepted the following emission limits for HAPs to preclude the applicability of 401KAR 52:020, Title V Permit and the Subpart M—National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products:

- Individual HAP emissions shall be less than or equal to 9 tons per rolling 12-month period.
- Combined HAPs emissions shall be less than or equal to 20 tons per rolling 12-month period.

***PM emissions:***

The coating spray booths are equipped with two layers of exhaust filters to control particulate emissions. The estimated control efficiency for these filters is 90%. The controlled PM/PM<sub>10</sub> emissions will remain below 401 KAR 59:010 allowable.

No control equipment is utilized for resistance welding machine line. The potential to emit PM/PM<sub>10</sub> is below KAR 59:010 allowable.

***Applicable Regulations:***

401 KAR 59:010, New process operations is applicable to the each facility (EP01, EP02, EP 03 and EP 04) for particulate emissions.

40 CFR 60, Subpart EE, Standards of Performance for Surface Coating of Metal Furniture is applicable to each metal furniture surface coating operation (EP 02, EP 03 and EP 04) in which organic coatings are applied. The emission of VOCs shall not exceed 0.90 kilogram per liter (7.51 pounds of VOC per gallon) of coating solids applied (volume-weighted calendar month average).

***Non applicable Regulations:***

401 KAR 59:225, New miscellaneous metal parts and products surface coating operations is not applicable to Lingo because the source accepted a source wide emission cap for VOCs emission less than or equal to twenty tons per year per Section 6(c)(3) of this regulation.

Subpart M—National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products is not applicable to Lingo because the source accepted source-wide HAP emission limits for single HAP 9 tons and for combined HAPs 20 tons per year to maintain a non-major source status.

**PERIODIC MONITORING:**

Compliance with annual emissions caps will be ensured by monitoring, record keeping and reporting specified in the permit. The Division is requiring the source to keep monthly records of usage of paintings and solvents at each of the spray booths. The source shall also keep records of the monthly and the twelve months rolling total for VOC and HAP emissions.

The Division is requiring the source to maintain a log of the pressure drop readings across the particulate filters, including the time, date, identity of the personnel making the record, and the dates of filters replacements.